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Affirmative Action/Equal Opportunity Employer

Stewardship Permit

Pursuant to Chapters 439 and 446k of the Connecticut General Statutes, a permit is issued to:

Permittee:

Town of Putnam Municipal Landfill 344 River Road Putnam, CT 06260 **Facility Identification:**

EPA ID No. CTD991288622 Permit Number: DEEP/REM/SP/2022-10648

To perform groundwater monitoring, maintenance of landfill caps, any engineered controls, and site-wide environmental investigation and cleanup (corrective action measures) at the hazardous and solid waste disposal facility in accordance with Connecticut General Statutes (CGS) Sections 22a-6, 22z-208a, 22a-449(c), and Section22a-449(c)-110 of the Regulations of Connecticut State Agencies (RCSA) as specified in the conditions set forth in this permit.

This permit regulates and authorizes the Permittee to perform groundwater monitoring, post-closure care, and maintenance of the landfill, any engineered controls and corrective action measures at the facility. The permit does <u>not</u> authorize operation of a hazardous and solid waste management facility in the sense of treating, storing, or disposing of hazardous wastes, or solid wastes, generated off-site. This permit represents a renewal of a previously issued Stewardship Permit for this Facility.

All terms in this permit are defined in the permit or if not defined in the permit are as defined in Section 22a-449(c)-100 of the RCSA incorporating, with changes, Title 40 of the Code of Federal Regulations (CFR) Parts 260, 261, 262, 264, 268, 270, 273 or 279.

This permit is based on the information described in the Stewardship Permit application (Application No. 202004688) filed on March 19, 2020 and the previously issued Stewardship Permit for this Facility. The Permittee must keep records of all data used to complete the permit application and any supplemental information submitted for the effective term of this permit. The permit application is incorporated by reference as part of the permit. Any false statements or inaccuracies contained in the information submitted by the Permittee may result in the suspension, revocation or modification of this permit and civil or criminal enforcement action.

The Permittee shall comply with all terms and conditions contained in the Permit. Any violation of any provision of this permit may subject the Permittee to enforcement action pursuant to the CGS including but not limited to Sections 22a-6a and 22a-131.

This permit is transferrable upon the Commissioner's written authorization, provided the Permittee and potential transferre have complied with the requirements set forth in CGS Section 22a-6o.

This permit may be revoked, suspended, modified, transferred, or reissued, in order to comply with applicable law. The Commissioner may also modify this permit when it is deemed necessary to do so.

The Permittee shall submit notifications and requests for revisions to this permit in accordance with RCSA 22a-449c-110, incorporating with changes 40 CFR 270. Any application shall be approved in writing by

the Commissioner prior to the Permittee implementing such change. The Permittee shall submit an application for a renewal of this permit to the Commissioner at least one hundred eighty (180) calendar days prior to its expiration date.

In the event of a conflict between any previously issued solid waste permit and the terms and conditions of this permit, the terms and conditions of this permit shall supersede.

This permit is hereby in effect and shall expire ten (10) years from this date.

July 5, 2022

Date

Graham Stevens, Bureau Chief

Bureau of Water Protection & Land Reuse

STEWARDSHIP PERMIT

TOWN OF PUTNAM MUNICIPAL LANDFILL

344 RIVER ROAD PUTNAM, CT

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SECTION I STANDARD FACILITY CONDITIONS

TOWN OF PUTNAM PUTNAM LANDFILL

SECTION I STANDARD FACILITY CONDITIONS

A. EFFECT OF PERMIT

Except as is provided in the Regulations of Connecticut State Agencies (RCSA) Section 22a-449(c)-110(a)(2) and except for any federally enforceable requirement(s), compliance with this permit (Permit) during its term constitutes compliance, for purposes of enforcement, with Connecticut General Statutes (CGS) Sections 22a-208a and 22a-449(c). This Permit may be modified, revoked and reissued, or terminated during its term as set forth in RCSA Section 22a-449(c)-110(a)(1), which incorporates by reference, with changes, Title 40 of the Code of Federal Regulations (40 CFR) Parts 270.41, 270.42 and 270.43.

To fulfill requirements of both the Connecticut Solid Waste Management Regulations and the Connecticut Hazardous Waste Management Regulations, the Permittee shall perform the activities required in Section II and Section III of this Permit. In the event of a conflict between the Permittee's application and the requirements of this Permit, the requirements of this Permit shall take precedence and apply.

The issuance of this Permit does not authorize any injury to persons or property or invasion of other private rights, or any infringement of state or local law or regulations.

Term (Duration) – The effective date of this Permit is the date on which the Permit is signed by the Commissioner or by the Commissioner's Designee. This Permit is in effect for a term of ten (10) years and may be renewed at the end of the term, in accordance with the requirements described in the "Duty to Reapply" Section of this Permit.

In accordance with 40 CFR 270.73(a), upon issuance of this Permit the Permittee's Interim Status granted under the Resource Conservation and Recovery Act (RCRA) is hereby terminated. In addition, upon the Commissioner's determination that the Permittee has satisfied the requirements of this Permit, a Certificate of Completion shall be issued to the Permittee.

B. SEVERABILITY

The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstances is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby.

C. CONFIDENTIAL INFORMATION

The Permittee may claim that any information required to be submitted by this Permit contains or constitutes confidential information in accordance with CGS Section 1-210(b).

D. IMMINENT HAZARD ACTIONS

Notwithstanding any provision of this Permit, enforcement actions may be brought pursuant to Section 7003 of the RCRA, CGS Section 22a-6, or any other applicable law.

E. DUTIES AND REQUIREMENTS

1. <u>Duty to Comply</u>

The Permittee shall comply with all conditions of this Permit except that the Permittee need not comply with the conditions of this Permit to the extent and for the duration such noncompliance is authorized in an Emergency Permit that explicitly authorizes any such noncompliance. Noncompliance by the Permittee with the terms of this Permit, except under the terms of an Emergency Permit, shall constitute a violation of this Permit and any applicable laws or regulations and is grounds for enforcement action, for Permit termination, revocation and reissuance or for denial of a Permit renewal. Emergency Permit as used herein shall mean Emergency Permit as identified in RCSA Section 22a-449(c)-110(a)(1) incorporating 40 CFR 270.61.

Unless superseded by a more stringent provision in this Permit, the Permittee shall comply with all of the applicable requirements of RCSA Sections 22a-133k-1 et. seq. (Remediation Standard Regulations or RSRs), as amended, and 22a-449(c)-100 et. seq., including any portion of 40 CFR 260 through 279 incorporated by reference therein.

A violation of this Permit for purposes of state and federal law constitutes a violation of a RCRA Permit.

2. <u>Duty to Reapply</u>

This Permit shall expire ten (10) years after the effective date of this Permit. The Permittee shall renew this Permit if any activity required under this Permit is not completed prior to the expiration date of this Permit. The Permittee shall apply for renewal of this Permit one hundred and eighty (180) calendar days prior to the date of expiration of this Permit, in accordance with RCSA Sections 22a-449(c)-104(a) and 22a-449(c)-110 incorporating 40 CFR 264.101 and 270.10(h) and any other applicable law.

3. <u>Obligation for Continuing Corrective Action, Post-Closure Care, Long-Term Stewardship Controls</u>

The Permittee is required to renew and continue this Permit for any period necessary to comply with the requirements of this Permit.

4. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce any activity authorized by this Permit in order to maintain compliance with the conditions of this Permit, unless otherwise required to do so by another state or federal authority.

5. Duty to Mitigate

In the event of noncompliance with this Permit, the Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are reasonable to prevent its noncompliance from having significant adverse impacts on human health or the environment. No action taken by the Permittee pursuant to this section of this Permit shall affect or limit the Commissioner's authority under any other statute or regulation.

6. Permit Actions

This Permit may be modified, revoked and reissued, or terminated as provided for in 40 CFR 270.41, 270.42 or 270.43, and in accordance with all applicable law, including but not limited to, CGS Sections 22a-6g and 6h and RCSA Sections 22a-3a-5 and 22a-449(c)-110. The filing of a request by the Permittee for a Permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any condition of this Permit.

7. <u>Property Rights</u>

This Permit does not convey any property rights of any sort, or any exclusive privilege to the Permittee.

8. Duty to Provide Information

The Permittee shall furnish to the Commissioner, within a reasonable time, any information which the Commissioner may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit or to determine compliance with this Permit. The Permittee shall also furnish to the Commissioner, upon request, copies of records required to be kept by this Permit.

9. Operation and Maintenance of Remedial Systems

The Permittee shall at all times properly operate and maintain all facilities and remedial systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit and any Long-Term Stewardship Plans applicable to this Facility. Proper operation and maintenance, at a minimum, includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate laboratory quality assurance procedures. This provision requires the operation of backup, auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this Permit.

10. <u>Inspection and Entry</u>

The Permittee shall allow the Commissioner, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

- (a) Enter at reasonable times upon the Site where a regulated activity is located or conducted, or where records must be kept under the conditions of this Permit;
- (b) Have access to and copy, at reasonable times, any records that shall be kept under the conditions of this Permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, operations regulated or required under this Permit; and
- (d) Sample or monitor at reasonable times, for the purposes of assuring Permit compliance or as otherwise authorized by RCRA, any substance or parameters at any location.

11. Security

Pursuant to RCSA Section 22a-449(c)-104 incorporating 40 CFR 264.14, the Permittee shall prevent the unknowing entry, and minimize the possibility for unauthorized entry, of persons or livestock onto the active portion of the Facility. The Permittee shall secure the Facility to the extent necessary to protect human health.

12. <u>Preparedness, Prevention, Contingency Plan and Emergency</u> Procedures

- (a) The Permittee shall comply with the requirements of RCSA Section 22a-449(c)-104(a)(1) incorporating 40 CFR 264 Subpart C "Preparedness and Prevention" and 40 CFR 264 Subpart D "Contingency Plan and Emergency Procedures" until active remediation is complete.
- (b) The Permittee shall ensure that each entity under contract to provide emergency response services at the Facility has a Permit, issued by the Commissioner pursuant to CGS Section 22a-454, authorizing such entity to provide emergency response services. The Permittee shall maintain a copy of such Permit in the operating record for its Facility. The Permittee shall ensure that any action(s) taken by an entity (including such entity's officers, employees, agents and subcontractors) providing emergency response services at its Facility conforms to the requirements of this Permit.
- (c) The Permittee shall ensure that each entity under contract with the Permittee to provide emergency response services visits the Site annually so that such entity is familiar with the Permittee's Site and can respond to an emergency. The Permittee shall maintain in the operating record for its Facility a certification, in accordance with the requirements of RCSA Section 22a-449(c)-110 incorporating 40 CFR 270.11, attested to by each emergency response entity under contract with the Permittee to provide emergency response services, stating that such entity has complied with the requirements specified in this paragraph.

13. Monitoring and Records

The Permittee shall ensure that samples and measurements taken for the purpose of monitoring are representative of the monitored activity.

The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this Permit (e.g. records from groundwater monitoring including wells and surface elevations), the certification required by RCSA Section 22a-449(c)-104 incorporating 40 CFR 264.73(b)(9), and records of all data used to complete the application for this Permit, for a period of at least three (3) years from the date of the sample, measurement, certification, report or application. This period may be extended by request of the Commissioner at any time. For disposal facilities these records shall be maintained for the post-closure period.

Records for monitoring information shall include:

(i) The date, exact place and time of sampling or measurements;

- (ii) The individual(s) or company who performed the sampling or measurements;
- (iii) The date(s) analyses were performed;
- (iv) The individual(s) or company who performed the analyses;
- (v) The analytical techniques or methods used; and
- (vi) The results of such analyses.

14. Operating Record

The Permittee shall maintain, in writing, the following information in the Facility's operating record until termination of this Permit:

- (a) Summary reports and details of all incidents that require implementing the Contingency Plan pursuant to 40 CFR 264 Subpart D;
- (b) Records and results of inspections as required by this Permit, except this data need only be kept for three (3) years from the date of any such inspection;
- (c) Monitoring, testing or analytical data, and corrective action where required by RCSA Section22a-449(c) 104, incorporating by reference 40 CFR 264 Subpart F or any regulatory section noted in 40 CFR 264.73(b)(6);
- (d) All closure, post-closure, and corrective action cost estimates under RCSA Section22a-449(c) 104, incorporating by reference 40 CFR 264.142 and 40 CFR 264 Subpart H; and
- (e) Any other information required by this Permit or by any applicable law to be maintained in the Facility Operating Record.
- (f) The Permittee shall ensure that a copy of the operating record is kept at the Town of Putnam Public Works Department or at an alternate location acceptable to the Commissioner.

15. Signatory Requirements

The Permittee's application and all reports or information submitted to the Commissioner by the Permittee pursuant to this Permit shall be signed by the person specified in and contain the certification prescribed in RCSA Section 22a-449(c)-110 incorporating 40 CFR 270.11 or the delegated licensed environmental professional for the Site.

16. Transfers

This Permit is not transferable to any person without the advanced written authorization of the Commissioner, who may request whatever information the Commissioner deems necessary regarding the potential transferee. Before any such transfer, the Permittee and any proposed transferee shall fully comply with the requirements of CGS Section 22a-6o. The Commissioner may require modification or revocation and reissuance of this Permit

to change the name of the Permittee and as an incident to any such transfer, incorporate such other requirements, as the Commissioner deems necessary.

In advance of transferring ownership or operation of its Facility prior to the termination of this Permit, the Permittee shall notify the prospective new owner or operator in writing of the requirements of this Permit, 40 CFR 264 through 270, and of the RCSA Section 22a-449(c)100 et al. The Permittee shall provide such prospective new owner or operator with a copy of this Permit.

The Permittee's failure to notify the new Permittee of the requirements of this Permit in no way relieves the new Permittee of his obligations to comply with all applicable requirements.

If the transfer of the property takes place and the Permittee retains this Permit, an access agreement between the Permittee and the prospective new owners of the Facility shall be approved by the Commissioner prior to the sale of the Facility/Site. The agreement shall include the anticipated times, locations and frequency of access needed in order for the Permittee to conduct post-closure care and corrective action activities and conduct inspection, operation and management activities for all remedial systems. A copy of any Operations and Management Plan, referenced in the "Operation and Maintenance of Remedial Systems" Section of this Permit, and any Long-Term Stewardship Plans applicable to this Facility shall be provided to the prospective new owner prior to transfer of the property.

17. Reporting Requirements

- (a) Anticipated Non-Compliance. The Permittee shall give as much advance written notice as possible to the Commissioner of any planned changes in the Facility or activity, which may result in non-compliance with any requirement of this Permit.
- (b) Compliance Schedules. Except where otherwise provided for in this Permit, reports of compliance and non-compliance with, or any progress reports on, interim and final requirements contained in any Compliance Schedule (Section III) of this Permit, shall be submitted no later than fourteen (14) calendar days following each schedule date, to the extent such reports are required herein.
- (c) 24-Hour Reporting.
 - (i) When required, immediate or 24-hour notification to DEEP shall be to the Remediation Division: Phone Number: 860-424-3705.
 - (A) Reports required by this subsection and follow-up written notifications, within 48 hours, for all immediate or 24-hour notifications, shall be submitted to:

Veronica Tanguay, Environmental Analyst veronica.tanguay@ct.gov
With a copy to DEEP.REMStewardship@ct.gov

(ii) The Permittee or designee shall verbally report to the Commissioner any remediation or waste related activity at its Facility, irrespective of whether such activity is in compliance with the requirements of this Permit, which does or may pose an imminent and substantial endangerment to human health or the environment, immediately but not later than twenty-four (24) hours from the time the Permittee becomes aware or should be aware of the circumstances causing such endangerment.

The report to the Commissioner shall include:

- (A) Name, address, and telephone number of the Permittee;
- (B) Name, address, and telephone number of the Facility;
- (C) Date, time and type of incident;
- (D) Description of the occurrence and its cause;
- (E) Name and quantity of waste(s) or constituents thereof involved;
- (F) The extent of injuries, if any;
- (G) An assessment of actual or potential hazards to human health and the environment;
- (H) Estimated quantity and disposition of recovered waste that resulted from the incident;
- (I) All information concerning the release of any waste or constituents thereof that may cause an endangerment to public drinking water supplies; and
- (J) All information concerning a release or discharge of waste or constituents thereof or of a fire or explosion from the Facility, which could threaten human health or the environment
- (iii) A written submission shall also be provided within five (5) calendar days of the time the Permittee becomes aware of the circumstances described in subdivision (i) above. The written submission shall contain a description of the endangerment and its cause; the period of endangerment including exact dates and times, if the endangerment has been abated, and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the endangerment. The Permittee shall maintain in the operating record of its Facility a copy of all such written reports. The Commissioner may waive the five (5) day written notice requirement in favor of a written report within fifteen (15) days of the incident requiring reporting.

- (iv) Nothing in this section shall affect or relieve the Permittee of its obligations under CGS Sections 22a-6u or 22a-450.
- (d) Other Noncompliance. The Permittee shall report all instances of noncompliance with this Permit not otherwise required to be reported by this Permit to the Commissioner as part of any other required monitoring report, no later than thirty (30) days of the date the Permittee is aware, or reasonably should have been aware of any such noncompliance. Any such report shall contain, at a minimum, the information listed in the 24-Hour Reporting requirements section of this Permit.
- (e) Other Information. When the Permittee becomes aware that it failed to submit any relevant facts or information in a Permit application, or submitted incorrect information in a Permit application, report or other document provided to the Commissioner regarding this Permit, it shall submit such relevant facts or correct information to the Commissioner within thirty (30) calendar days of becoming aware of such facts or information.

18. Computation of Time

- (a) Except as is expressly provided for in this Permit, the computation of time periods set forth in this Permit shall be as follows:
 - (i) Any time period scheduled to begin on the occurrence of an act or event shall begin on the day after the act or event.
 - (ii) Any time period scheduled to begin before the occurrence of an act or event shall be computed so that the period ends on the day before the act or event.
 - (iii) If the final day of any time period falls on a Saturday, Sunday or a federally or state recognized legal holiday, the time period shall be extended to the next working day.
- (b) Submission of Reports. Where this Permit requires the submission of a written report, a notification or other information or documentation to the Commissioner, the report or notification shall be deemed submitted on the date such report, notification or other information is received by the Department.

19. Availability, Retention and Disposition of Records

The Permittee shall ensure that all records required under RCSA Sections 22a 449(c) 100 to 119, the Remediation Standard Regulations or this Permit, including all plans, are furnished upon request, and made available at all reasonable times for inspection, by any officer, employee, or representative of the Department or the United States Environmental Protection Agency (EPA).

The retention period for all records required under RCSA Sections 22a-449(c)-100 to 119 and this Permit is extended automatically during the course of any unresolved enforcement action regarding the Facility or as requested by the Commissioner or the Regional Administrator of EPA.

20. Additional Requirements

Requirements not included in this Permit, which become effective by statute or regulation, and not made specifically inapplicable to facilities with a Permit, shall apply to the Permittee's Facility. In the event of any conflict between this Permit and any such requirement, the Permittee shall comply with the more stringent requirement. If the Permittee does not fully comply with the more stringent requirement, the Department may enforce either requirement.

21. Federal, State and Local Laws

Nothing in this Permit shall be construed to prohibit any federal, state or political subdivision thereof from imposing any requirements to the extent authorized by law which are more stringent than those imposed by this Permit.

In addition, nothing in the Permit shall relieve the Permittee of its obligation to comply with any other applicable federal, state, or local statute, regulation or ordinance.

22. <u>Modification of the Compliance Schedule</u>

The Permittee may request to modify the submittal due dates of the Compliance Schedule (Section III) of this Permit at any time. Such requests shall be submitted for the Commissioner's review and written approval and shall include sufficient justification for such request(s).

The Commissioner may grant extensions of submittal due dates based on the Permittee's demonstration that sufficient justification for the extension exists. Extensions to due dates, which this Permit explicitly defines as being due by a certain time or during a certain time interval, may be granted by the Commissioner if sufficient justification for the extension is demonstrated by the Permittee.

23. Delegation of a Licensed Environmental Professional

The Commissioner may delegate direction and oversight of the long-term stewardship obligations required to be conducted at this facility to a licensed environmental professional (LEP), licensed pursuant to RCSA Section 22a-133v. In that case, once sitewide environmental investigation at the Facility has been performed in accordance with prevailing standards and guidelines, and remediation activities have addressed any and all requirements of the Commissioner and have achieved compliance with Connecticut's Remediation Standard Regulations, such LEP shall submit a Verification of such investigation and remediation activities.

- (a) In the event the Commissioner revokes the LEP delegation then the Permittee shall ensure all reports and documents required by this Permit are submitted for the Commissioner's review and written approval within the timeframes specified.
- (b) The Permittee shall notify the Commissioner in writing of the identity of any LEP other than one previously identified by the Permittee, within ten (10) days after assigning or retaining any LEP for the purpose of addressing the actions required by this Permit. The Permittee shall submit to the Commissioner a description of the assigned LEP's education, experience and training which is relevant to the

work required by this Permit within ten (10) days after a request for such a description has been made. Nothing in this paragraph shall preclude the Commissioner from finding a previously acceptable LEP unacceptable.

F. DEFINITIONS

Any term not otherwise defined herein shall be defined as that term is defined in RCSA 22a-449(c)-100 through 119 incorporated 40 CFR 264 through 279. Notwithstanding references elsewhere in this Permit to additional requirements or federal, state and local laws, in the event of any conflict between any of the following definitions and any definition provided in any other applicable legal requirement, the following definitions shall control:

- 1. "Active Remediation" or "Active Remedial Activities" shall mean the period prior to completion of activity conducted pursuant to Section II of this Permit, with the exception of that period when the only remaining activity are activities such as post-remedial monitoring or monitored natural attenuation.
- 2. "Annual" with respect to monitoring shall mean that any associated required inspections, sampling, and analysis shall occur no later than December 31st of the calendar year. The results of such sampling and analysis shall be submitted to the Commissioner no later than March 1st of the subsequent year.
- 3. "Area of Concern" or "AOC" shall mean any area has had a probable release of a hazardous waste or hazardous constituents and that is determined by the Department to pose a current or potential threat to human health or the environment.
- 4. "Certificate of Completion" shall mean a document recognizing the Commissioner's determination that all environmental investigation and remediation has been completed and no long-term stewardship obligations remain. This non-regulatory certificate is issued based on the Commissioner's regulatory determination that a Permit is not needed for the Facility or portion of Facility.
- 5. "Certificate of Stewardship" shall mean a document recognizing the Commissioner's issuance of a Long-Term Stewardship Permit for the Facility. This non-regulatory certificate is issued to communicate that the Permit's purpose is not to authorize commercial waste management operations, and is limited to environmental investigations, remediation, and long-term stewardship obligations.
- 6. "Constituent of Concern" shall mean a component, breakdown product, or derivative of a substance that may be found in the environment as a result of a release at or from the Facility, or a reaction caused by such a release, and that is determined by the Department to pose a current or potential threat to human health or the environment.
- 7. "CFR" shall mean the Code of Federal Regulations in effect on the date that this Permit is issued.
- 8. "Commissioner" shall mean the Commissioner of Energy and Environmental Protection as defined in the CGS Section 22a-2 or the Commissioner's duly authorized designee.
- 9. "Corrective Action" shall mean the process of identifying, investigating, and remediating releases of hazardous constituents to the environment. "Corrective action" and "remediation" may be used interchangeably in this Permit.
- 10. "Department" or "DEEP" shall mean the Connecticut Department of Energy and Environmental Protection.

- 11. "Discover," "Discovery," or "Discovered" refer to the date on which the Permittee either: (i) visually observes evidence of a new Solid Waste Management Unit (SWMU) or Area of Concern (AOC), (ii) visually observes evidence of a previously unidentified release of hazardous constituents to the environment, (iii) receives information which suggests the presence of a new release of hazardous waste or hazardous constituents to the environment, or (iv) receives information which indicates the presence of a previously undocumented release of hazardous waste or hazardous waste constituents to the environment.)
- 12. "Environmental Land Use Restriction" (ELUR) shall mean the easement granted to the Commissioner by the property owner that is recorded on the municipal land records in order to reduce the risk of human exposure to pollutants and hazards to the environment by preventing specific uses or activities at a property or a portion of a property, pursuant to Section 22a-133q-1 of the Regulations of Connecticut State Agencies, as revised on June 27, 2013, and as may be amended from time to time.
- 13. "Facility" shall mean, pursuant to 40 CFR 260.10 all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing or disposing of hazardous waste and all contiguous property under control of the owner or operator.

A specific, legally definable land parcel that is one of multiple parcels comprising the Facility may separately receive a Certificate of Completion from the Commissioner for only that parcel and portion of the facility. This Certificate of Completion indicates the Commissioner's approval that all remediation is complete and no long-term stewardship obligations remain for that parcel (as indicated by the issuance of a letter determining that "remediation is complete without controls" and a "certificate of completion"). If such a finding is made then the terms "Site" and "Facility" shall subsequently refer only to the land that no longer includes such parcel.

For the purposes of this Permit, Facility shall mean the easterly, approximately, 12.5-acre portion of the 80-acre parcel of land located on 344 River Road in Putnam, CT and subject to the requirements of this Permit (see Site Plan Figure in Appendix A-1).

- 14. "Final Closure" shall mean the completion of the closure of all Hazardous Waste Management Units at the Permittee's Facility in accordance with the requirements of this Permit.
- 15. "Hazardous Waste" or "Hazardous Wastes" shall mean hazardous waste as identified or listed as hazardous waste pursuant to 42 U.S.C. Section 6901 et. seq. and RSCA Section 22a-449(c)-101.
- 16. "Hazardous Waste Management Unit" or "HWMU" shall mean a contiguous area of land on or in which hazardous waste is placed, or the largest area in which there is a significant likelihood of mixing hazardous waste constituents in the same area and are subject to the closure and post-closure requirements of 40 CFR 264 Subpart G. Examples include: surface impoundment, waste pile, land treatment area, landfill cell, incinerator, a tank, and a greater than 90 day storage area.
- 17. "Land Disposal Unit" or "Land Disposal Facility" shall mean for the purpose of this Permit, the "Municipal Solid Waste Area" as defined in this Permit.

- 18. "Municipal Solid Waste Area" means the approximately 12.5-acre area located along the easterly section of the parcel adjacent to the Quinebaug River that was used by the Town of Putnam for the disposal of Municipal Solid Waste and lead carbonate button dust.
- 19. "Permittee" shall mean the person responsible for the overall operation of the facility who has been issued a license by the Commissioner. As used herein "person" is defined in Section 22a-423, Chapter 446k, of the CGS and "license" is defined in Section 4-166, Chapter 54 of the CGS.
- 20. "Post-Closure Period" shall mean the period during which waste remains in place in a land disposal unit and maintenance and monitoring is required. The Commissioner is extending the Post-Closure Period for a minimum of ten (10) years from the date of this Permit's issuance, and for as long as this Permit is renewed or continues in effect, because waste or contamination remains in place. In the event all wastes and contaminated environmental media are removed, an alternate Post-Closure Period may be approved by the Commissioner.
- 21. "Quarterly" with respect to inspections, sampling and analysis shall mean that the inspections, sampling and analysis shall occur approximately once every three (3) consecutive months in a calendar year (e.g. January, April, July and October). The results of such inspections, sampling and analysis shall be submitted to the Commissioner according to the schedules established in the Long-Term Stewardship Plan(s).
- 22. "Regulated Unit" shall mean a surface impoundment, waste pile and land treatment unit or landfill that received hazardous waste after July 26, 1982 and is subject to the requirements of 40 CFR 264.91 through 264.100 for detecting, characterizing and responding to releases in the uppermost aquifer.
- 23. "Remediation" shall mean the process of identifying, investigating, and remediating releases of hazardous constituents to the environment. "Corrective action" and "remediation" may be used interchangeably in this Permit.
- 24. "Remediation Standard Regulations" (RSRs) means the Connecticut Remediation Standard Regulations as defined in the Regulations of Connecticut State Agencies (RCSA), Sections 22a-133k-1 through 22a-133k-3, adopted January 1, 1996 and amended June 27, 2013 and as otherwise amended.
- 25. "Semi-annual" with respect to inspections, sampling and analysis shall mean that sampling and analysis shall occur approximately once every six (6) consecutive months in a calendar year (e.g. during January and July, or April and October). The results of such inspections, sampling and analysis shall be submitted to the Commissioner according to the schedules established in the Long-Term Stewardship Plan(s).
- 26. "Solid Waste Management Area" or "SWMU" shall mean any unit which has been used for the treatment, storage or disposal of solid or hazardous wastes at any time, or any area that has been contaminated by routine or systematic releases of hazardous waste or hazardous constituents and are subject to the corrective action requirements of 40 CFR 264 Subpart F.
- 27. "Site" shall mean the same or geographically contiguous property which may be divided by public and private right-of-way, provided the entrance and exit between the properties is at a crossroad intersection, and access is by crossing opposed to going along, the right-of-way. Non-contiguous

- properties owned by the same person but connected by a right-of-way that such person controls and to which the public does not have access, is also considered part of the site property. The terms "Facility" and "Site" may be used interchangeably in this Permit.
- 28. "Verification" shall mean the rendering of a written opinion by a licensed environmental professional on a form prescribed by the commissioner that an investigation of the parcel has been performed in accordance with prevailing standards and guidelines and that the Facility has been remediated in accordance with the remediation standards.

SECTION II AUTHORIZED ACTIVITIES

TOWN OF PUTNAM MUNICIPAL LANDFILL

<u>SECTION II</u> <u>AUTHORIZED ACTIVITIES</u>

A. FACILITY POST-CLOSURE REQUIREMENTS

1. <u>Post Closure Care Plan</u>

The Permittee shall perform post-closure care of the Land Disposal Unit as specified in the Facility's existing Post-Closure Care Plan, unless it is superseded by the approval of a revised Post-Closure Care Plan submitted pursuant to this Permit (herein after, the "approved Post-Closure Care Plan").

The Permittee shall conduct all post closure care of the Land Disposal Unit in accordance with the approved Post-Closure Care Plan.

2. Revised Post-Closure Care Plan

The Permittee shall, as needed, prepare and submit for the Commissioner's review and written approval a revised post-closure care plan for the Land Disposal Unit developed in accordance with the requirements set forth in RCSA Section 22a-209-13 and 40 CFR 264 Subparts F, G and N. The revised post-closure care plan shall include:

- (a) A description and frequency of the planned maintenance and inspection activities that will be performed to ensure: (A) the integrity of the cap/final cover and/or other containment systems; and (B) the function of the monitoring equipment;
- (b) A compliance monitoring program developed in accordance with the requirements of RCSA Section 22a-449(c)-104 incorporating 40 CFR 264.99, and an evaluation of the existing monitoring data to determine if compliance is achievable;
- (c) If it is determined that compliance cannot be achieved the Permittee shall include a description of how corrective action, required pursuant to 40 CFR 264.100, will be interrelated into site-wide corrective activities;
- (d) The name, address and phone number of the Facility contact person during the Post-Closure Care Period;
- (e) A schedule for the reporting requirements, including but not limited to, groundwater monitoring reports, scheduled and unscheduled inspection and maintenance reports, and corrective action reports resulting from inspection and maintenance activities; and
- (f) A detailed estimate of the cost of performing post-closure care of the Land Disposal Units developed in accordance with the 40 CFR 265 Subpart H.

3. <u>Modifications to Approved Post-Closure Care Plan</u>

The Permittee shall submit a written notification or request for a permit modification to authorize a change in the approved Post-Closure Care Plan in accordance with the applicable requirements of 40 CFR 124 and 40 CFR 270. The written notification or request must include a copy of the amended post-closure care plan for the Commissioner's review and written approval.

4. <u>Copy of Post-Closure Care Plan</u>

The Permittee shall ensure that a copy of the approved Post-Closure Care Plan is kept at Town of Putnam Public Works Department or at an alternate location acceptable to the Commissioner.

5. Notification Requirements for Newly Discovered Releases

- (a) The Permittee shall notify the Commissioner in writing of any newly discovered release(s) of solid or hazardous waste or hazardous waste constituents discovered during the course of post-closure care, groundwater monitoring, environmental audits, or other means, within fifteen (15) calendar days of the date of discovery.
- (b) If the Commissioner determines that further investigation of the Site is needed, the Permittee shall be required to prepare a plan for further investigation within sixty (60) calendar days of notification by the Commissioner.

6. Inspections

- (a) The Permittee shall inspect the Land Disposal Units for malfunctions, deterioration, and discharges, which may lead to any release of hazardous or solid wastes. The Permittee shall remedy any deterioration which an inspection reveals, to ensure that the problem does not lead to an environmental hazard. Where a hazard is imminent or has already occurred, remedial action shall be taken immediately.
- (b) The Permittee shall ensure inspections are performed on a quarterly basis either by or under the direction of a registered professional engineer or a licensed environmental professional. Such inspections shall include, but not be limited to:
 - (i) Odors and dust control;
 - (ii) Conditions of the access road;
 - (iii) Erosion, settling, subsidence or other events that may affect the grading;
 - (iv) Integrity of the final cover soils and vegetation;
 - (v) Drainage control;
 - (vi) Leachate seeps; and
 - (vii) Groundwater monitoring systems.
- (c) The Permittee shall record all inspections in an inspection log. The inspection logs shall include: the date and time of the inspection, the name of the inspector and company or affiliation, a notation of the observations made, and the date and nature of any repairs. Such records shall be kept for at least three (3) years from the date of inspection or for longer if a more stringent condition applies, and maintained in

either an electronic format with a copy available to the Commissioner upon request, or a written copy in the Facility's Operating Record.

7. Maintenance of Final Cover

The Permittee shall ensure that the final cover for the Land Disposal Units is properly maintained and repaired when necessary in accordance with the approved Post-Closure Care Plan. Proper maintenance shall include, but not be limited to, ensuring that:

- (a) For areas in which erosion has occurred, the lost material shall be replaced and the area re-seeded;
- (b) Obstructions to the drainage structures are removed and properly disposed; and
- (c) The Permittee shall maintain systems and remedy any deterioration which an inspection reveals a release has or is likely to occur to ensure that the problem does not lead to an environmental hazard. Where a hazard is imminent or has already occurred, remedial action shall be taken immediately.

8. Monitoring Obligations.

The Permittee shall at all times properly operate and maintain all monitoring wells which are installed or used by the Permittee to achieve compliance with this Permit as described in the approved Long-Term Stewardship Plan. Proper maintenance, at a minimum, includes inspections to detect existing and potential problems and adequate funding to maintain proper conditions and repair any problems.

9. Notification Requirements for Newly Discovered Releases

- (a) The Permittee shall notify the Commissioner in writing of any newly discovered release(s) of solid or hazardous waste or hazardous waste constituents discovered during the course of post-closure care, groundwater monitoring, environmental audits, or other means, within fifteen (15) calendar days of the date of discovery.
- (b) If the Commissioner determines that further investigation of the Site is needed, the Permittee shall be required to prepare a plan for further investigation within sixty (60) calendar days of notification by the Commissioner.

10. <u>Future Corrective Action</u>

If the Commissioner determines that environmental data indicates the remediation was not effective, or is needed to address newly identified releases, the Permittee shall within one hundred eighty (180) days of the Commissioner's notice, submit for the Commissioner's review and written approval, a plan for the additional characterization and corrective action.

11. <u>Landfill Decomposition Gas Monitoring</u>

(a) The Permittee shall conduct gas monitoring in accordance with the requirements of 40 CFR 258.23 and "Section 6 of the Putnam Landfill Closure and Post-Closure Plan" dated February 1998 and approved by the Department on November 3, 1998. Herein after, the "approved Gas Monitoring Plan".

- (b) The Permittee shall ensure that, at a minimum, the soil gas probes along the southeastern property boundary are monitored as specified in the approved Gas Monitoring Plan.
- (c) The Permittee shall perform soil gas monitoring on a quarterly basis as specified in the approved Gas Monitoring Plan, unless otherwise approved in writing by the Commissioner.
- (d) The Permittee shall submit a written notification or request for a permit modification to authorize a change in the approved Section 6 of the Putnam Landfill Closure and Post-Closure Plan in accordance with the applicable requirements of 40 CFR 124 and 40 CFR 270. The written notification or request must include a copy of the amended Section 6 of the Putnam Landfill Closure and Post-Closure Plan for the Commissioner's review and written approval.

12. Miscellaneous

- (a) For any substances reported at or emanating from the Site, for which no remediation criteria has been adopted under the Remediation Standard Regulations, the Permittee shall, in accordance with the Remediation Standard Regulations, submit for the Commissioner's review and written approval a proposal for additional remediation and establishment of criteria for additional polluting substances.
- (b) The Permittee shall not operate the Facility in any manner that stores, treats, or disposes of hazardous wastes or in any way manages hazardous wastes other than hazardous wastes that may be generated during Facility maintenance, authorized closure and/or corrective action activities. Such waste shall be managed in accordance with all applicable regulations. The Permittee shall comply with all applicable requirements of RCSA Section 22a-449(c)-102 incorporating 40 CFR Part 262 "Standards Applicable to Generators of Hazardous Waste".

13. Public Participation Plan

The Permittee shall implement the Public Participation Plan dated March 17, 2020. The Permittee shall submit a revised public participation plan sixty (60) calendar days after notice by the Commissioner that revisions are needed. Such Public Participation Plan shall include:

- (a) The development and maintenance of a site mailing list that at a minimum includes: the Chief Elected Official, Town Manager, the Director of Health, the Fire Chief, and Planning and Zoning Department for the Town of Putnam; the State Representative(s) and Senator(s) that represent the Town of Putnam; and any property owners identified in this Permit listed in Appendix A-1.
- (b) A provision for notifying the owners and/or occupants of the properties identified below at least thirty (30) calendar days prior to the start or completion of remediation work or when there is a significant change in the environmental conditions of the Site or area(s) potentially affected by the Site. Such properties are listed in Appendix A-2 of this Permit.

- (c) A provision for notifying the owners and/or occupants of any additional properties identified by the US EPA or the Department to be within the area in which the ground waters can reasonably be expected to become polluted as the result of any pollution emanating from the Site;
- (d) A public notice prior to the start of or completion of remedial activities at the Site or area affected by the Site or any portion thereof consistent with this Permit and the requirements of CGS Section 22a-134a(i);
- (e) The submittal of a copy of such notice to the Commissioner ten (10) calendar days prior to the date of the publication; and
- (f) The submittal of a written summary of all comments received and responses thirty (30) calendar days after the end of the comment period.

The Permittee shall implement the public participation plan sixty (60) calendar days prior to any proposals for modifying any existing or future remedial system of treatment and control, or any significant change in site conditions.

14. Public Notice Requirements

The Permittee shall provide public notice of any proposed remediation. Each public notice must provide a forty-five (45) calendar day comment period and a public information meeting no earlier than thirty (30) calendar days from the date of the public notice and no later than forty-five (45) calendar days after the public notice.

- (a) Prior to the commencement of any proposed remedial action, the public notice shall summarize the investigations undertaken, the results of the investigations, clearly identify the proposed remedial activities, and include an address and telephone number for a contact person. The Permittee shall:
 - (i) Publish the notice in a newspaper having substantial circulation in the municipality in which the Site or the affected area is located;
 - (ii) Broadcast the notice on a radio station during the high-volume listening times on the same day the notice is published;
 - (iii) Provide a copy of the notice to the Chief Elected Official, Town Manager and the Director of Health of the municipality where the Site or affected area is located;
 - (iv) Provide a copy of the notice to the owner or operator of the Site (if the Permittee is not the Site owner or operator) and to all persons on the Facility mailing list maintained pursuant to 40 CFR 124.10(c)(1)(ix); and
 - (v) Erect and maintain a sign at least six (6) feet by four (4) feet for at least thirty (30) calendar days in a legible condition at the Site, clearly visible from the public highway and including the words "ENVIRONMENTAL"

CLEAN-UP IN PROGRESS AT THIS SITE. FOR FURTHER INFORMATION CONTACT:", and a telephone number at which any interested person may obtain additional information about the remediation.

B. WATER QUALITY MONITORING REQUIREMENTS

1. Water Quality Monitoring Plan

The Permittee shall perform surface and groundwater monitoring in accordance with the August 2015 Remedial Action Plan which includes the modification to the 1998 Post Closure Groundwater and Surface Water Monitoring Plan, approved by the Commissioner, of this Permit; until it is superseded by the approval of a revised Water Quality Monitoring Plan submitted pursuant to. this Permit. Herein after, the "approved Water Quality Monitoring Plan".

The Permittee shall conduct all surface and groundwater monitoring in accordance with the approved Water Quality Monitoring Plan.

2. Revised Water Quality Monitoring Plan

If at any time the Commissioner or the Permittee determines that a revision to the Water Quality Monitoring Plan is needed or required, the Permittee shall prepare and submit for the Commissioner's review and written approval a revised water quality monitoring plan for the site developed in accordance with the requirements set forth in 40 CFR 264 Subpart F and incorporates surface water monitoring.

3. <u>Modifications to Approved Water Quality Monitoring Plan</u>

The Permittee shall submit a written notification or request for a permit modification to authorize a change in the approved Water Quality Monitoring Plan in accordance with the applicable requirements of 40 CFR 124 and 270. The written notification or request must include a copy of the amended water quality monitoring plan for the Commissioner's review and written approval.

4. <u>Copy of Approved Water Quality Monitoring Plan</u>

The Permittee shall ensure that a copy of the approved Water Quality Monitoring Plan is kept at the Town Engineer's Office at the Town Hall or at an alternate location acceptable to the Commissioner.

5. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all monitoring wells which are installed or used by the Permittee to achieve compliance with this Permit. Proper maintenance, at a minimum, includes inspections to detect existing and potential problems and adequate funding to maintain proper conditions and repair any problems at the Site.

6. Quality Assurance Project Plan

The Permittee shall prepare and submit for the Commissioner's review and written approval a Quality Assurance Project plan (QAPP), prepared in accordance with US Environmental Protection Agency guidance, and incorporating Connecticut's Reasonable Confidence Protocols. The Permittee shall ensure that the data is of sufficient quality to make decisions regarding investigation, potential remediation, and monitoring of the Site.

7. <u>Monitoring Frequency</u>

The Permittee shall perform surface and groundwater monitoring on a quarterly basis. Upon the Commissioner's approval of the revised Water Quality Monitoring Plan, submitted pursuant to this Permit, the Permittee shall perform surface and groundwater monitoring in accordance with the frequency specified in the approved Water Quality Monitoring Plan.

8. <u>Future Corrective Action Groundwater Monitoring</u>

If the Commissioner determines that the surface and groundwater monitoring data indicates the soil and/or groundwater remediation was not effective, the Permittee shall within one hundred eighty (180) days of the Commissioner's notice, submit for the Commissioner's review and written approval, a plan for additional soil and groundwater characterization and establishment of a corrective action program consistent with the objectives of 40 CFR 264.100.

C. FINANCIAL RESPONSIBILITY

1. Cost Estimates

The Permittee shall submit for the Commissioner's review and written approval written estimate(s) for the current cost of performing closure, post-closure care inclusive of surface and groundwater monitoring, investigation for the Hazardous Waste Management Units, and investigation and remediation of the Site or areas affected by the Site in accordance with the requirements of this Permit. The Permittee shall ensure that such written estimates are prepared in accordance with the methodology specified in RCSA 22a-449(c)-104 incorporating 40 CFR 264.142(a) and 40 CFR 264.144(a), as applicable.

Note a fifteen percent (15%) contingency shall be applied to the estimates for unforeseeable elements or events which may increase the cost of performing closure, post-closure care and corrective action.

2. Establishment of Financial Assurance

In accordance with the time frame specified in the Compliance Schedule of this Permit, the Permittee shall establish and continually maintain financial assurance using one or more of the instrument or financial test formats prescribed by the Commissioner for closure, post-closure care, investigation and remediation of the Facility or areas affected by the Facility.

3. <u>Inflationary Adjustments</u>

The Permittee shall adjust amounts of financial assurance to reflect inflationary costs as required by RCSA Section 22a-449(c)-104 incorporating 40 CFR 264.142, and any factors that bear on the cost of performing the work that remains to be completed under this Permit. Adjustments shall be made each year, on the anniversary of the establishment of the mechanism(s) for financial assurance until the Commissioner releases the Permittee from the financial assurance requirements of this Permit.

The latest adjusted cost estimate(s) shall be kept at the Facility and a signed original shall be submitted to the Commissioner within fourteen (14) calendar days of preparation.

4. Periodic Reductions

Upon request by the Permittee, the Commissioner may approve periodic reductions in the amount of financial assurance commensurate with the modification or completion of

obligations. Such request shall include a revised cost estimate and demonstration of completed work activities which equates to at least a fifteen percent (15%) reduction in the estimate costs.

5. <u>Maintenance of Financial Assurance</u>

The Permittee shall maintain such financial assurances in effect until the Commissioner notifies the Permittee in writing that it is no longer required to maintain such a mechanism for financial assurances as provided for in this Permit.

SECTION III COMPLIANCE SCHEDULE

TOWN OF PUTNAM MUNICIPAL LANDFILL

SECTION III COMPLIANCE SCHEDULE

A. RETENTION OF CONSULTANT OR LEP

Within thirty (30) calendar days of the effective date of this Permit, the Permittee shall retain one or more qualified consultant(s), licensed professional engineer(s) (PE), or LEP(s), acceptable to the Commissioner to oversee the activities and prepare the documents required by this Permit and shall, by that date, notify the Commissioner in writing of the identity of such environmental compliance expert and/or LEPs, consultants. The Permittee shall assign and/or retain such qualified LEP, PE, or consultant, acceptable to the Commissioner, until the Permittee has fully complied with this Permit.

B. SCHEDULE/SCOPE OF WORK

All conditions set forth in this Section of this Permit, shall be conducted within the defined calendar days of the effective date of this Permit specified for each item. Otherwise, the Permittee may be subject to formal enforcement actions.

The Permittee shall submit for the Commissioner's review and written approval, a proposed schedule for the submission and implementation of:

1. Per- and Polyfluorinated Alkyl Substances Sampling

Submit a groundwater monitoring plan for assessing concentrations of per- and polyfluorinated alkyl substances (PFAS) in on-site monitoring wells within 180 calendar days of the effective date of this permit.

2. Revised Public Participation Plan

A revised Public Participation Plan for the Commissioner's review and written approval in accordance with the requirements of the Conditions of this Permit and that specifies how public participation will be conducted when modifications are proposed for the obligations required for this Permit. The revised Public Participation Plan shall be submitted within 180 calendar days of the effective date of this Permit.

3. Long-Term Stewardship Plan

A Long-Term Stewardship Plan for the Commissioner's review and written approval in accordance with the requirements of the Conditions of this Permit. The Long-Term Stewardship Plan shall consist of a Revised Post-Closure Care Plan and a Revised Water Quality Monitoring Plan. The Long-Term Stewardship Plan shall be submitted with the 2023 Annual Progress Report.

4. Quality Assurance Project Plan

A Quality Assurance Project Plan prepared in accordance with the requirements of this Permit.

5. Updated Cost Estimate

A cost estimate for conducting long-term stewardship obligations in accordance with the requirements of Section II of this Permit. The updated Cost Estimate shall be submitted within 180 calendar days of the effective date of this Permit.

C. MAINTAIN FINANCIAL ASSURANCE

Within one hundred fifty (150) calendar days of the Commissioner's approval of the cost estimate submitted in accordance with this Permit, the Permittee shall continually maintain financial assurance by one or more of the instrument or financial test formats prescribed by the Commissioner for Final Closure of the regulated units and corrective action of the Site or areas affected by.

D. ANNUAL PROGRESS REPORTS

Until all actions required by this Permit have been completed to the Commissioner's satisfaction, the Permittee shall submit a progress report for the Commissioner's review. The annual report will be prepared on a calendar-year basis describing the actions which the Permittee has taken in the prior calendar year to comply with the terms and conditions of this Permit. Each such report shall be submitted to the Department by March 1st of each year.

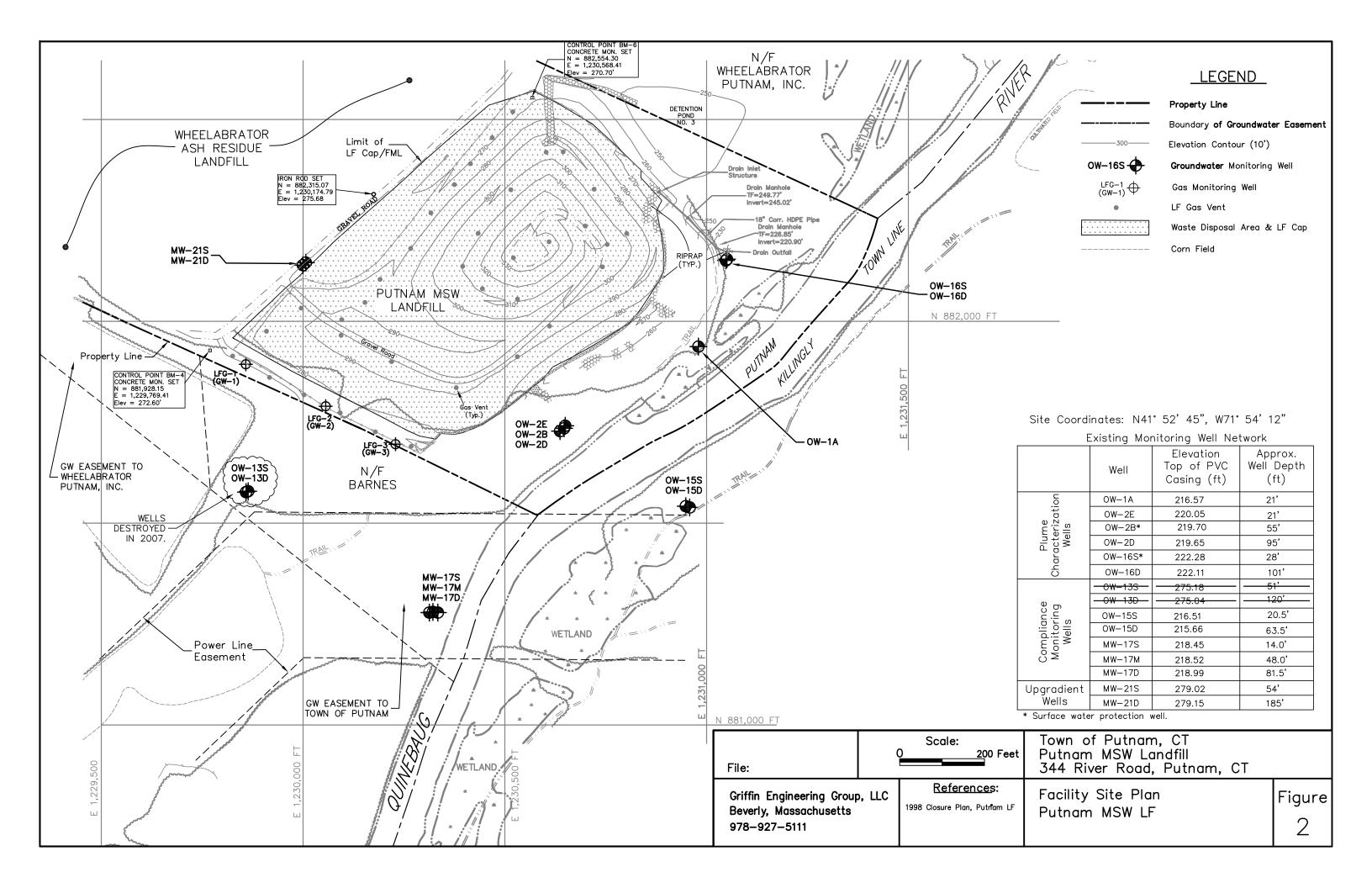
Such reports shall, at a minimum:

- Describe the actions which the Permittee has taken in the prior calendar year to comply with the terms and conditions of this Permit;
- Summarize with charts and graphs any exceedances of Remediation Standard Regulations criteria or drinking water exceedance levels detected during monitoring;
- Identify the measures taken to correct the cause of any such exceedances of Remediation Standard regulations or drinking water criteria;
- Summarize the results of any inspections of engineered controls and institutional controls;
- Summarize corrections taken to address deficiencies identified in inspections of remediation systems, engineered controls, and institutional controls;
- Recommend, as appropriate, modifications of groundwater monitoring plans and remedial systems; and
- Identify any planned work for the upcoming year.

The Commissioner may issue a notice of deficiency to require the modification and revision of the Annual Progress Report. The Commissioner may respond to requests for changes in any plans being implemented at the Facility that are included in the Annual Progress Report. The Annual Progress Report shall contain the certification prescribed in RCSA Section 22a-449(c)-110 incorporating 40 CFR 270.11, signed by the Permittee or Licensed Environmental Professional or Professional Engineer.

APPENDIX A-1 SITE MAP

TOWN OF PUTNAM
MUNICIPAL LANDFILL



APPENDIX A-2 ABUTTING PROPERTIES

TOWN OF PUTNAM
MUNICIPAL LANDFILL

Table 1-List of abutting properties provided in 2010 Stewardship Permit

Map-Block-Lot	Location of Property	Owner's Name and Mailing
120.7.6	200 P: P 1	Address
120-7-6	388 River Road	David A. Barnes
		Bruce E. Barnes
		873 Providence Pike
		Putnam, CT 06260
120-7-7	376 River Road	David A. Barnes
		Bruce E Barnes
		Route 44
		Chepachet, RI 02814
120-5-0	371 River Road	Lucille J. Viens Life Use
		c/o Michael D Viens
		395 River Road
		Putnam, CT 06260
120-4-0	341 River Road	Putnam River Road LLC
		PO Box 271
		Putnam, CT 06260
120-2-0	322 River Road	Old Cemetery
		c/o Town of Putnam
		126 Church Street
		Putnam CT 06260
120-1-1	314 River Road	Wheelabrator Putnam, Inc.
		Attn AP 4th Floor
		4 Liberty Lane West
		Hampton, NH 03842
118-14-2	27 Town Farm Road	Wheelabrator Putnam, Inc.
		Attn AP 4th Floor
		4 Liberty Lane West
		Hampton, NH 03842
N/A	Town of Killingly, CT	Town of Killingly, CT
1 11 12	1 e wii e i i i i i i i j	Attn: Bruce E. Benway, Town
		Manager
		PO Box 6000
		172 Main Street
		Danielson, CT 06239

Table 2 - Other Interested Parties

Hope O'Shaughnessy, Putnam	40 Chassey St, Putnam	Hope O'Shaughnessy
Resident		40 Chassey Street, Apt D
		Putnam, CT 06260